

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

STATE OF RHODE ISLAND; et al.,

Plaintiffs,

v.

DONALD TRUMP, in his official capacity as
President of the United States; et al.,

Defendants.

C.A. No. 1:25-cv-00128-JJM-LDA

SUPPLEMENTAL DECLARATION OF ADRIAN P. FONTES

Pursuant to 28 U.S.C. § 1746, I, Adrian Fontes, hereby supplement my prior declaration, signed on April 1, 2025, and further declare as follows:

1. On April 8, 2025, the Arizona State Library, Archives and Public Records (“State Library”) requested a drawdown of \$67,000 from its Library Services and Technology Act (LSTA) 2025 grant administered by the Institute of Museum and Library Services (IMLS).

2. In the normal course, and prior to the issuance of Executive Order 14,238, the State Library receives a response from IMLS to its drawdown request within one to two business days. Such a response would either inform the State Library that there will be additional review or that the request will be granted.

3. However, since the State Library submitted its request on April 8, 2025, the State Library has not received any response from IMLS. This is highly unusual and has created great uncertainty for the State Library.

4. The State Library submitted a separate drawdown request on April 10, 2025, for \$108,100 from its LSTA 2024 grant. The State Library has yet to receive any response from IMLS regarding that drawdown request.

5. As I noted in my initial declaration, the State Library budgeted LSTA funds for 12 employees. Due to the uncertainty created by IMLS's unusual lack of communication and considering the extreme reduction in IMLS staff, the State Library had no choice but to notify ten employees that the State Library could only guarantee their employment through May 29, 2025. The State Library only has funds to pay the salaries for these employees through May 29, 2025, and was relying on timely receipt of LSTA grant funds to continue to pay their salaries.

6. As shown above, the State Library has needed to make drastic budget and staff cuts due to its LSTA grant funds being in limbo, an unusual lack communication from IMLS, and the termination of most IMLS staff. The funding impediments resulting from the federal government's actions and inactions have severely impacted morale at the State Library. Each affected employee is valued and would have been retained by the State Library if not for Executive Order 14,238 and IMLS's actions and inactions in furtherance of that order.

7. As highlighted in my initial declaration, due to the reduction in IMLS staff and uncertainty around LSTA grant funding, the State Library had to eliminate its Digital Navigator Program. The Digital Navigator Program provided one-on-one phone assistance to help Arizona communities get online and served as a free tech support hotline for digital learning and information on accessing low-cost internet and computer offers. The State Library provided public notice that the Digital Navigator Program was discontinued due to uncertainty with federal funding, effective April 1, 2025, on its website (<https://connect-arizona.com/digital-navigators>).

8. The State Library also had to eliminate ten temporary contractor positions that facilitated the Digital Navigator Program.

9. Due to the uncertainty surrounding the State Library's ability to draw down and receive LSTA grant funds in a timely manner, the State Library must also cancel its Summer Library Institute—Arizona's long-standing library development program. The program was to take place at an Arizona college campus in the first week of June 2025. It is a week-long professional development event that brings together rural library staff from all regions of Arizona to learn about new trends, technologies and best practices in the field. Individuals from rural libraries apply for the program and have the opportunity to form lasting connections as they experience a variety of workshops, sessions, and keynote speeches by renowned experts and practitioners. Topics cover a variety of areas, including library collection development and programming, outreach, community engagement, and project management.

10. The future of additional programs and subgrants, including those noted in paragraphs 28 and 29 of my initial declaration, remain under discussion. ✓

I declare under penalty of perjury under the laws of the United States that, to the best of my knowledge, the foregoing is true and correct.

Executed on this 11th day of April, 2025, at Phoenix, Arizona.



Adrian P. Fontes, Secretary of State
State of Arizona